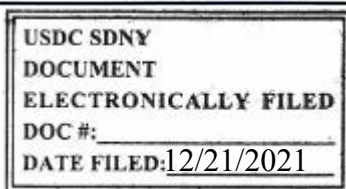


Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief



Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

December 15, 2021

BY ECF & E-MAIL

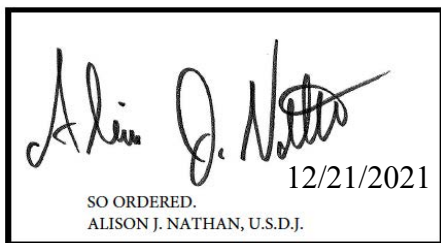
Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Andrew Joyner,
20 Cr. 505 (AJN)**

Dear Judge Nathan:

The Court finds that the interests of justice served by granting an exclusion from the speedy trial computations from today's date through January 17, 2022 outweigh the interests of the public and the Defendant in a speedy trial in order to allow the parties to continue their discussions towards a pre-trial disposition of this case.

I write to provide the Court with an update regarding Mr. Joyner's neuropsychological evaluation in connection with the above-captioned case. Dr. Miranda Rosenberg evaluated Mr. Joyner at MDC Brooklyn on December 6, 2021 and requires some time to digest the results and prepare a preliminary report, which the defense intends to use in plea negotiations with the Government. Accordingly, and without objection from the Government, I respectfully request leave to file a status update with the Court on or before January 17, 2022 regarding a pre-trial resolution of this matter. Because this additional period of delay is necessary to facilitate a resolution to ongoing plea negotiations, the parties respectfully request that the Court exclude this time from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A).



Cc: AUSA Andrew Rohrbach
Counsel for the Government

Respectfully Submitted,

Andrew J. Dalack, Esq.
Assistant Federal Defender

Counsel for Andrew Joyner